

# Exhibit 3

KEITH FISCHER Confidential  
Keith Fischer, et al. vs GEICO

August 28, 2024  
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1	IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK -----x	1 Fischer 2 THE VIDEOGRAPHER: Good morning. We 3 are now on the record. The time is 10:06 4 a.m. on August 28, 2024. This begins the 5 video deposition of Keith Fischer taken in 6 the matter of Keith Fischer versus 7 Government Employees Insurance Company 8 filed in the United States District Court 9 for the Eastern District of New York, the 10 case number of which is 2:23 Civ. 11 2848(GRB)(ARL).
2	KEITH FISCHER, MICHAEL O'SULLIVAN, JOHN MOESER, LOUIS PIA, THOMAS BARDEN, CONSTANCE MANGAN, and CHARISE JONES, Individually and on behalf of all others similarly situated,	12 My name is Adrienne Chemmel. I am 13 your videographer today. The court 14 reporter is Joe Danyo. We are 15 representing Esquire Deposition Solutions. 16 Will everyone present please identify 17 themselves and state whom you represent, 18 after which the witness will be sworn in.
3	Plaintiffs,	19 MS. DSOUZA: Zarka Shabir Dsouza from 20 Outten & Golden for the Plaintiffs.
4	-against- Case No. 9 2:23 Civ. 2848 GOVERNMENT EMPLOYEES INSURANCE (GRB)(ARL) 10 COMPANY d/b/a GEICO,	21 MS. ALBERTY: Tiffany Alberty of 22 Duane Morris on behalf of the Defendant 23 GEICO.
5	Defendant. -----x	24 THE VIDEOGRAPHER: Will the court 25 reporter please swear in the witness, and
6	August 28, 2024 10:06 a.m.	
7	***This Transcript Contains a Confidential Section***	
8	Videotaped Deposition of KEITH FISCHER, taken by Defendant, pursuant to Notice and Agreement, held at 1540 Broadway, New York, New York, before Joseph R. Danyo, a Shorthand Reporter and Notary Public within and for the State of New York.	
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	Page 2	Page 4
1	A P P E A R A N C E S : 2 OUTTEN & GOLDEN LLP 3 Attorneys for Plaintiffs 4 1225 New York Avenue, N.W. 5 Suite 1200B 6 Washington, D.C. 20005 By: ZARKA SHABIR DSOUZA, ESQ. HANNAH COLE-CHU, ESQ.	1 Fischer 2 then, Counsel, you may proceed. 3 KEITH FISCHER, having been first 4 duly sworn by Joseph R. Danyo, a Notary Public, 5 was called as a witness and testified as follows: 6 EXAMINATION BY MS. ALBERTY: 7 Q. Can you please state and spell your 8 first and last name. 9 A. Keith, K-e-i-t-h, Fischer, 10 F-i-s-c-h-e-r.
2		11 MS. ALBERTY: Let the record reflect 12 that this is the discovery deposition of 13 Mr. Keith Fischer taken pursuant to notice 14 and by agreement of the parties. Today's 15 deposition will be taken in accordance 16 with all applicable rules.
3		17 Q. Mr. Fischer, I know I introduced 18 myself off the record, and I just stated my name 19 for the record, but I'm Tiffany Alberty. I'm 20 counsel for GEICO, the Defendant in this case.
4		21 I'm going to be asking you a series 22 of questions about your background, your 23 experience at GEICO. Before we get started, have 24 you been deposed before?
5		25 A. Deposed, I mean as far as grand jury,
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1	Fischer	1	Fischer
2	claims.	2	Q. Your Social Security that you're
3	Q. Would this have been for everything	3	getting, is that under Social Security Disability
4	of personal property including residential?	4	Insurance?
5	A. No. I did mostly vehicle. Just	5	A. Yes, it is.
6	about all vehicle.	6	Q. And how long have you been under SSDI
7	Q. Then did you resign, or were you	7	for?
8	terminated from Allstate?	8	A. I'm going to say 2022. Two years.
9	A. I resigned in good standing at	9	About two years.
10	Allstate and joined GEICO Insurance May 10th,	10	Q. I'm going to jog your memory here.
11	1999.	11	Let's go back to 1999.
12	Q. Why did you leave Allstate?	12	A. Okay.
13	A. Better, a little bit more as far as	13	Q. When you first started at GEICO, do
14	salary, but the freedom to do what I felt I did	14	you remember what your title was?
15	best was go out into the street and talk to	15	A. SIU investigator, to the best of my
16	people and interview people.	16	recollection.
17	Q. Okay. So from 1999 until what day	17	Q. Were you always full time?
18	did you work for GEICO?	18	A. Yes.
19	A. From May 10, 1999 to I believe it	19	Q. What type of investigations did you
20	was, I believe today is my anniversary, my	20	conduct when you first started at GEICO in 1999?
21	four-year anniversary. My last vacation day was	21	A. To the best of my recollection, I
22	today, but I actually probably didn't retire	22	handled just about everything that was given to
23	until November 1st was my actual day of 2000.	23	us. I didn't have a specific category or claim
24	Q. 2000 or 2020?	24	that I would handle whatever was given to us by
25	A. I'm sorry. 2020.	25	the inside staff, would give us our cases. In
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1	Fischer	1	Fischer
2	Q. Okay. No problem. I just wanted to	2	our mailbox we would come and pick them up and
3	double-check.	3	whatever it was asked we were asked to do.
4	A. Yeah. That would have been 21 and a	4	Q. So for GEICO they have quite a few
5	half years.	5	different lines of insurance. Were you handling
6	Q. Okay, and we'll get more into the	6	every aspect, meaning commercial, residential,
7	substance of your experience at GEICO, but, when	7	property, cyber?
8	you retired in November of 2020, did you assume	8	A. Property.
9	any other employment then thereafter?	9	Q. When you first started in 1999, were
10	A. No.	10	you assigned to a region?
11	Q. Have you worked since let's say	11	A. Region 2.
12	November of 2020 any type of odd jobs, part-time,	12	Q. Did you work in region 2 for your
13	1099, independent contractor status?	13	entire tenure?
14	A. No.	14	A. Yes.
15	Q. So your wife, did she retire as well?	15	Q. When you started in 1999, were you
16	A. Yes. She retired about a month after	16	assigned to a geographic location?
17	I did.	17	A. To the best of my recollection, we
18	Q. Okay, and since her retirement, to	18	were given the five boroughs of New York City,
19	your knowledge, has she worked?	19	Nassau and Suffolk.
20	A. No.	20	Q. Did that geographic area ever expand
21	Q. What is your source of income now, if	21	during your tenure?
22	any?	22	A. I was asked to travel upstate several
23	A. I have my New York City Police	23	times up to Syracuse, Binghamton, Rochester, that
24	pension, I have Social Security, and I have a	24	area, to handle some cases. Yes.
25	401(k).	25	Q. How frequent would you say you were

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<p>1                   Fischer</p> <p>2 handling let's say cases up north?</p> <p>3       A. I did for about six months. I was</p> <p>4 under a different supervisor who was assigned up</p> <p>5 there, and I had agreed to travel up there one or</p> <p>6 two days a week and conduct cases up there. They</p> <p>7 were short on staff.</p> <p>8       Q. Do you remember when in time that</p> <p>9 would have occurred?</p> <p>10      A. Probably after 2006, 2005, somewhere</p> <p>11 in there maybe.</p> <p>12      Q. Okay.</p> <p>13      A. I believe Cheryl Darenthal was the</p> <p>14 supervisor at the time. So that might have been</p> <p>15 2008, '09, '10, to the best of my recollection.</p> <p>16      Q. Okay. Focusing on the claims in this</p> <p>17 case, it's my understanding that it would have</p> <p>18 started at the end of 2016 into then when you</p> <p>19 retired. Does that sound right to you?</p> <p>20      A. Could you repeat the question.</p> <p>21      Q. Sure. As far as the claims and the</p> <p>22 time period, because you've worked for GEICO for</p> <p>23 so long, it's my understanding that the claims</p> <p>24 would have occurred at the end of 2016 all the</p> <p>25 way through to when you retired. Does that sound</p>	<p>Page 29</p> <p>1                   Fischer</p> <p>2 2016. I'm not sure if I really had any</p> <p>3 catastrophes after 2016, to the best of my</p> <p>4 recollection. There could have been, but from</p> <p>5 what I remember it was prior to that.</p> <p>6       Q. So then let's circle back. As an SIU</p> <p>7 investigator, were you assigned to a specific</p> <p>8 level?</p> <p>9       A. When I first started at GEICO, I was</p> <p>10 a grade 65, and that was in 1999, and in 2004</p> <p>11 five years later I was promoted to grade 66. I</p> <p>12 believe I was one of four investigators promoted</p> <p>13 to that.</p> <p>14      Q. Okay, and tell me what's the</p> <p>15 difference between a 65 and a 66, to your</p> <p>16 recollection?</p> <p>17      A. 66, in accordance with the regular</p> <p>18 day-to-day investigations, I was also asked as a</p> <p>19 66 to train all the new investigators that came</p> <p>20 on board. I was asked to do ride-alongs with</p> <p>21 inside staff or counsel depending on the</p> <p>22 supervisor's requests. I was probably given</p> <p>23 between four and six more cases a month being at</p> <p>24 that level. I had to take on more serious cases</p> <p>25 to do things out of the ordinary that some people</p>	
<p>1                   Fischer</p> <p>2 right?</p> <p>3       A. Yes.</p> <p>4       Q. So I will try my best to</p> <p>5 differentiate if we're going back in time to when</p> <p>6 you first started at GEICO, but really the focus</p> <p>7 will be around that time consideration of 2016 up</p> <p>8 until your retirement. Okay?</p> <p>9       A. Okay.</p> <p>10      Q. So, for that specific time frame,</p> <p>11 2016 until your retirement, fair to say that the</p> <p>12 cases that you handled would have been in the</p> <p>13 five boroughs, Suffolk and Nassau County?</p> <p>14      A. That's correct.</p> <p>15      Q. Did you handle any type of claims</p> <p>16 outside of the State of New York between that</p> <p>17 time frame?</p> <p>18      A. Yes, I did. I was asked to go, I was</p> <p>19 assigned to the catastrophe team, and I did</p> <p>20 travel to Houston, Texas, and Denver, Colorado</p> <p>21 twice I believe to handle hail claims in Denver</p> <p>22 and flood claims in Houston, Texas.</p> <p>23      Q. Do you remember when in time that</p> <p>24 would have been?</p> <p>25      A. That might have been just prior to</p>	<p>Page 30</p> <p>1                   Fischer</p> <p>2 wouldn't have to do. It usually came at the</p> <p>3 request of my supervisor Jerry Cassagne.</p> <p>4       Q. What were the duties and</p> <p>5 responsibilities for a level 65?</p> <p>6       A. To handle cases given to us by the</p> <p>7 inside staff, anything from bodily injuries to</p> <p>8 theft claims to social media to visiting</p> <p>9 attorneys with pictures and letters requesting</p> <p>10 that they drop cases. They were called operation</p> <p>11 challenges. Typing. Every day doing</p> <p>12 face-to-face interviews, coordinating with the</p> <p>13 National Insurance Crime Bureau, police</p> <p>14 personnel. I also had a significant arson</p> <p>15 contingent of investigators that I had to deal</p> <p>16 with because I dealt with thefts and fires as far</p> <p>17 as GEICO was concerned. I have an arson</p> <p>18 background.</p> <p>19      Q. With?</p> <p>20      A. The Levittown Fire Department.</p> <p>21      Q. With the duties that you just</p> <p>22 outlined as a level 65, would a level 66 have to</p> <p>23 take on those duties in conjunction then with the</p> <p>24 training that you previously spoke about?</p> <p>25      A. Yes.</p>	<p>Page 32</p>

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1	Fischer	1	Fischer
2	Q. You also stated as a 66 you would be assigned four to six more cases a month, and 4 would that have been under the same scope of 5 cases that you just spoke about?	2	In other words, they would be given 3 only 20 cases, because they were what GEICO had 4 deemed level 1 cases, because there were usually 5 3 and 4 occupants in the car, which meant a 6 larger number of examinations under oath.
6	A. Yes.	7	Usually about the 18th or 19th or 8 20th of the month, that particular team would 9 reach their maximum amount of cases that they 10 could receive, which was laid down or supplied to 11 us by supervisors, and, at that point, I would 12 take on staged accident losses, because those 13 particular five, six, seven investigators were 14 now cut off from staged accidents.
7	Q. Which would have been social, auto, 8 operation challenges?	15	So, in addition to my theft claims, I 16 was also asked to do staged and caused losses.
9	A. I would like to clarify my answer.	17	Q. Okay. Was that something that only 18 uniquely applied to you, if you know?
10	As time went on, I thought we were back in the 11 early 2000's, as time went on, I became more of 12 the theft coordinator, but in addition to my 13 theft investigations, I also handled staged 14 accidents, caused accidents, social media. Being 15 a 66, I was expected to handle bigger cases, more 16 pattern cases I guess you could say, rings, 17 things of that nature as a 66.	19	A. No. There was a few of us. Not just 20 myself. I wasn't singled out, but a lot of us 21 had to take on additional work from other teams 22 even though we were assigned to the theft team.
18	Q. In 2016 until your retirement, what 19 percentage of theft cases would you say you were 20 handling?	23	Q. For those who were on your theft 24 team, do you know, say, for example, if John, 25 Vito or Maria had to then take on staged
21	A. Probably 70 percent of my claims were 22 theft.		
23	Q. Then what percentage were you 24 handling staged accidents?		
25	A. About 20 percent.		
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1	Fischer	1	Fischer
2	Q. And then what about social media?	2	accidents to assist with that department?
3	A. Yeah. That was maybe 5 percent, and 4 then we were given the other 5 percent was policy 5 claims. Usually checking on people's vehicles 6 where they lived, rate evading, things like that.	3	MS. DSOUZA: Objection.
7	Q. In 2000, and I want to focus in 2016 8 were you assigned to a specific team?	4	Q. You can answer.
9	A. Yes. I was assigned to my 10 supervisor, Jerry Cassagne. I was assigned to 11 the theft team.	5	A. Did they have to take those claims 6 on?
12	Q. Who was comprised of that team at 13 that time?	7	Q. Yes.
14	A. Myself, John Gillane, Vito, I've got 15 the wrong last name. Vito, and what's her name? 16 Maria Munoz.	8	A. Is that what you're asking?
17	Q. From 2016 onward until your 18 retirement, were you always assigned to Jerry's 19 team as the theft team?	9	Q. To your knowledge.
20	A. It did change. To the best of my 21 recollection, I did primarily theft claims. 22 There were times that I was asked, if I can 23 expand my answer, as time went on, in the theft 24 team, there became times where the staged 25 accident team was cut off at a certain time.	10	A. Yes.
		11	Q. I think from your testimony, as I 12 understand it, you did not work in the office. 13 Is that right?
		14	A. That's right.
		15	Q. Did you ever have an inside role?
		16	MS. DSOUZA: Objection.
		17	A. No.
		18	Q. In your position from 2016 until your 19 retirement, did you have a set schedule, meaning 20 I worked Monday through Friday 9 to 5?
		21	A. No.
		22	Q. Did you have flex time?
		23	A. We were, I guess that's what it was 24 called. Yes. You could start and stop depending 25 on your schedule, depending on your examinations

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1	Fischer	1	Fischer
2	THE VIDEOGRAPHER: We are back on the	2	Q. Were some weeks busier than others?
3	record at 11:46 a.m.	3	A. Yes.
4	BY MS. ALBERTY:	4	Q. Were there certain times of the year
5	Q. Okay. So, before we took a break, we	5	that were busier than others?
6	were talking about the different types of claims	6	A. Not to my recollection. Everything
7	that you would investigate. For any of the	7	was, there was no certain time of the year.
8	claims that you investigated for the five	8	Busier? I will say the summer was busy because
9	boroughs, Suffolk and Nassau County, how far	9	people were on vacation. So, yes, that was quite
10	would you drive, meaning mileage, max?	10	busy. We handled up to 60 or 70 cases depending
11	A. An estimate, I mean I would do, to be	11	on I think there was five to seven people were
12	fair, I mean between 500 to 1200 miles a month.	12	allowed to go on vacation at any given time. So
13	I had to fill out a monthly mileage record.	13	that meant that you had to take those 2 to 300
14	Obviously during COVID there was no mileage, but	14	cases and divide them up.
15	from '16 to '20, it depended on where my cases	15	Q. If somebody went out, say, for
16	were located, whether Staten Island, Brooklyn or	16	example, on short-term leave, say one week or was
17	the Bronx or how many EUOs I did.	17	out on a holiday, would you step in only for that
18	So I would say the minimum 4 to 500 a	18	week to handle whatever was necessary for that
19	month and some months a thousand to 1200 a month.	19	case, or would you then assume the entirety of
20	Q. I apologize. My question was not	20	the case and work it from the very beginning to
21	great. Regarding, how do I want to articulate	21	the end?
22	this, regarding how far you would drive, meaning	22	A. I would work it from the beginning to
23	hours. Clearly you're not driving 500 miles in	23	the end. It was now my case. Are you talking
24	one day.	24	about if they had existing claims prior to going
25	A. No.	25	on vacation? Their cases?
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1	Fischer	1	Fischer
2	Q. So, in a day, what was, you know, the	2	Q. Yes.
3	time that you spent in the car obviously not	3	A. Yes, there would be times where we
4	considering COVID times?	4	would have to conduct examinations under oath or
5	A. Some days as many as five to six	5	go out and do some steps depending on who you
6	hours and some days two hours. It depended on	6	worked with. In the theft team there was only
7	the number of EUOs that I had or where my cases	7	four or five of us. So in SIU you were given two
8	were located. I lived pretty much centrally	8	or three days prior to your vacation to catch up
9	located in Nassau. So I was 30 miles from the	9	on your cases. Then you would go away for a week
10	city, and I was 30 to 40 miles from Suffolk.	10	say, and then you would come back, and you were
11	Q. I think you said, for the claims that	11	given another day.
12	you handled up north, you're just unsure when in	12	So there was about ten days there
13	time that would have occurred?	13	that, not only did you have to do your 60 or 70
14	A. It was prior to this 2016. I'm	14	cases, but you had to go in and touch the cases
15	almost positive.	15	of other examiners or if they asked you to maybe
16	Q. Okay. Prior to COVID, how many	16	do some examinations under oath that were
17	claims would you handle a week in, again, sorry,	17	scheduled, you would do it for them and/or maybe,
18	the 2016 to 2020 time frame?	18	if you were out in Queens, you would do a canvass
19	A. I'm going, approximately between 30	19	or interview one of their insureds, because they
20	to 60 a month. It depended on the year. As time	20	had to make entries into their case certain
21	went on and we lost investigators, obviously the	21	dates. We were given guidelines to touch our
22	cases grew because there was less personnel.	22	cases so many days a month.
23	Q. And that 30 to 60 cases per month	23	Q. Do you know how many times you had to
24	range, did that fluctuate?	24	touch a case a month if it was in theft?
25	A. Yes.	25	A. I had to touch it at least, to the

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1	Fischer		
2	best of my recollection, four or five times a		
3	month. The 3rd day, the 8th day, I believe the		
4	15th day, the 21st day and then closure usually		
5	within I believe 28 days. Something to that		
6	effect.		
7	Q. Did you say you had to close the case		
8	within 28 days?		
9	A. No, no, you could have a case open		
10	for three or four months, but we were given a set		
11	of guidelines that we had to not only make these		
12	entries, but the quicker that we closed the claim		
13	the better your rating.		
14	Q. For example, social media, was there		
15	a requirement to touch the case a specific amount		
16	of times per month?		
17	A. From 16 to 20 guidelines and		
18	procedures changed numerous times. Each year,		
19	just to give you an example, a theft claim when I		
20	first started, maybe let's say '14 or '15, you		
21	had to touch a case within three days. If we got		
22	it on a Friday, you had to touch it on a Monday.		
23	At the end, to give you a perspective on it, you		
24	had to touch it the same day. You had to touch		
25	it within five hours. So we lost that two days.		
1	Fischer		
2	On a Friday before 3 o'clock if I got		
3	let's say five cases during the day, I had to		
4	touch them before 10 o'clock, 8 o'clock,		
5	10 o'clock at night. So I had to do something on		
6	it to touch them to get into them and show that I		
7	had gotten the case, that I knew about the case,		
8	and I had spoken to somebody or done something on		
9	the case.		
10	Q. And was this regarding social media		
11	cases or theft cases?		
12	A. I'm sorry, I was using theft as an		
13	example. Social media, there was procedures that		
14	you had to follow. You had to touch it the day		
15	that you got it. In 2019, 2020, it could even		
16	have been '18, you had to touch the case the day		
17	you got it. You were expected to close that		
18	social media usually within three to five days I		
19	would say, and sometimes you'd go longer, but		
20	that's usually when you were required to complete		
21	it and submit it.		
22	Q. For these guidelines that you stated		
23	changed every year, was that set forth by GEICO?		
24	A. Yes.		
25	Q. How was that communicated to you?		

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1	Fischer		
2	I went to. I would plot in my days. 7 a.m. to		1 overtime with which somebody said denied?
3	10 o'clock at night, 11 o'clock at night, and		3 A. I never put in for any other
4	they would self-generate 16 hours to 18 hours for		4 requests. I can only speak for myself.
5	the day. I do -- I can only remember twice where		5 Q. And as to then getting approved to
6	I actually did it on my timesheet while working		6 enter in your OT, which you did then enter in
7	in region 2 in the SIU. Two or three times. I		7 your OT, were you paid for that overtime, to your
8	don't want to say. It could have been more than		8 recollection?
9	that, you know. It wasn't less than that.		9 A. Yes.
10	Q. I think I'm losing you just a little		10 Q. Have you ever put in more than 7.75
11	bit. So are you saying there's two different		11 hours for a day with which you didn't seek
12	systems with which you put in your overtime		12 pre-approval?
13	hours, one specifically only for cat cases and		13 A. Only during catastrophes.
14	one specifically only related to theft cases?		14 Q. What does that process look like?
15	A. Oh, no. It's the same system. I'm		15 A. I answer to an SIU supervisor, Dale,
16	sorry.		16 I forget his last name. He was from that region
17	Q. Okay, and for, when you would go in		17 in Colorado and/or Houston. He actually traveled
18	and adjust your time, I think you had indicated		18 with me on both, and at that point he would say
19	that you would adjust it to 16 hours if you		19 that we worked a 12-hour day. I'm going to give
20	needed to.		20 you two hours travel in the morning. I am going
21	A. Let's say ten. I know one day I put		21 to give you two to three-hour reporting time at
22	in for 10.75, and I got 43 hours. I got 41.75		22 night when you go back to your hotel room.
23	instead of 38.75. I put in for three hours and		23 Q. Okay, and so then you would just
24	ten minutes I think one day.		24 enter your hours after you both agreed to
25	Q. Okay, and, when that was submitted		25 whatever that hour was in the Workday system, and
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1	Fischer		
2	through Workday when you closed out for the two		1 Fischer
3	weeks in your custom and practice, then it was		2 then would you get paid then that corrected
4	approved, is that right?		3 amount?
5	A. I had to pre-approve it with Jerry		4 MS. DSOUZA: Objection.
6	who had to pre-approve it with Bill.		5 A. To the best of my recollection, I did
7	Q. What did the pre-approval process		6 go through the Workday system to put in my
8	look like before you would go in and then adjust		7 overtime to the best of my -- I'm almost positive
9	the numbers in the Workday system?		8 it went through. Did I get paid? Yes.
10	A. It would send Jerry an e-mail stating		9 Q. Transitioning to number 9, it states,
11	that on August 28th, 2024 I went out to Brooklyn,		10 "From 2016 to approximately March 2020, I worked
12	New York, where I secured a high-end vehicle,		11 about ten to 12 hours a day Monday through Friday
13	waited for police to arrive at 2 o'clock in the		12 and eight hours on many weekends. I estimate
14	morning. I waited until 5 o'clock. I am		13 working a total of 50 to 65 hours a week on
15	respectfully requesting overtime in the amount of		14 average during this time period."
16	three hours.		15 On what do you base these estimates?
17	Q. And then you would send an e-mail.		16 A. My caseload and the knowledge that I
18	Would you get correspondence back saying		17 did this each and every day. My day started
19	approved?		18 early in the morning, and it went to late at
20	A. Yes.		19 night. I was fortunate enough that my wife was
21	Q. Or denied?		20 an investigator and knew the pressures and the
22	A. It would be back -- that one time I		21 stress at GEICO. She worked there herself. So
23	got it back from Jerry that it was approved.		22 after dinner I would go back on the computer, and
24	Q. Did you ever, to your recollection,		23 I would, because now it was downtime. I knew I
25	receive any e-mail back after you requested		24 wasn't receiving cases after 4 or 5 o'clock, and
			25 for that 3 or 4 hours I could type in peace and

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1	Fischer		1	I N D E X	
2	MS. ALBERTY: Objection.		2	Witness	Examination by
3	A. Yes.		3	KEITH FISCHER	Ms. Alberty
4	MS. DSOUZA: I think that is it.		4		Ms. Dsouza
5	MS. ALBERTY: I don't have any		5		269
6	further questions. Thank you.		6		
7	MS. DSOUZA: Thank you.		7		
8	THE VIDEOGRAPHER: This marks the end		8	E X H I B I T S	
9	of the deposition. We are going off the		9	Fischer	
10	record at 5:33 p.m.		10	Exhibit 1	Revised Notice of Deposition of
11	(Time noted: 5:33 p.m.)				Keith Fischer
12	_____		11	Exhibit 2	Document Bates stamped G000028
13	_____		12		through 43
14	Subscribed and sworn to		13	Exhibit 3	Document Bates stamped G004265
15	before me this _____ day of _____, 2024.				and attachment
16	_____		14	Exhibit 4	Plaintiff Keith Fischer's
17			15		Responses to the Court's
18			16		Interrogatories and Declaration
19			17	Exhibit 5	of Keith Fischer
20					Second Amended Collective and
21					Class Action Complaint
22			18	Exhibit 6	Document Bates stamped
23			19		P00000490 through 494
24			20	Exhibit 7	Document Bates stamped 00000078
25					through 064
			21	Exhibit 8	Document Bates stamped
			22		P00000077
			23	Exhibit 9	Plaintiff Keith Fischer's
			24		Responses and Objections to
					Defendant's First Set of
					Interrogatories
			25		~oo~
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1			1		
2	C E R T I F I C A T I O N		2	DEPOSITION ERRATA SHEET	
3			3	Our Assignment No. 11658332	
4	I, JOSEPH R. DANYO, a Shorthand Reporter			Case Caption: Keith Fischer v GEICO	
5	and Notary Public, within and for the State of New				
6	York, do hereby certify:				
7	That I reported the proceedings in the		5	DECLARATION UNDER PENALTY OF PERJURY	
8	within entitled matter, and that the within transcript		6	I declare under penalty of perjury that I have	
9	is a true record of such proceedings.		7	read the entire transcript of my deposition taken in	
10	I further certify that I am not related, by		8	the above-captioned matter or the same has been read	
11	blood or marriage, to any of the parties in this		9	to me, and the same is true and accurate, save and	
12	matter and that I am in no way interested in the		10	except for changes and/or corrections, if any, as	
13	outcome of this matter.		11	indicated by me on the DEPOSITION ERRATA SHEET	
14	IN WITNESS WHEREOF, I have hereunto set my		12	hereof, with the understanding that I offer these	
15	hand this 2nd day of September, 2024.		13	changes as if still under oath.	
16			14	Signed on the _____ day of _____	
17			15	2024.	
18	JOSEPH R. DANYO		16	_____	
19	STATE OF NEW YORK		17	KEITH FISCHER	
20	My Commission Expires 2/20/2027		18	Subscribed and sworn to on the _____ day of	
21			19	_____, 2024 before me.	
22			20	_____	
23			21	_____	
24			22	Notary Public in and for the State of New York.	
25			23		
			24		
			25		